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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

DONALD WORTMAN,
 WILLIAM ADAMS,
 MARGARET GARCIA, individually and
 on behalf of all others similarly situated,

Plaintiffs

v.

AIR NEW ZEALAND, ALL NIPPON
 AIRWAYS, CATHAY PACIFIC
 AIRWAYS, CHINA AIRLINES, EVA
 AIRWAYS, JAPAN AIRLINES
 INTERNATIONAL, MALAYSIA
 AIRLINES, NORTHWEST AIRLINES,
 QANTAS AIRWAYS, SINGAPORE
 AIRLINES, THAI AIRWAYS, UNITED
 AIRLINES,

Defendants.

CASE NO. CV 07-5634 EDL

MDL No. 1913

**NOTICE OF SUPPORT FOR MOTION
 FOR APPOINTMENT OF INTERIM
 LEAD COUNSEL FILED BY
 PLAINTIFFS DONALD WORTMAN,
 WILLIAM ADAMS AND MARGARET
 GARCIA**

Date: March 28, 2008

Time: 10:00 a.m.

Judge: Hon. Charles R. Breyer

Complaint filed: 11/6/07

1 Walter J. Lack and his firm, Engstrom, Lipscomb & Lack (“Lack Firm”) submit this
2 Statement of Support for Cotchett, Pitre & McCarthy’s Motion for Appointment of Interim Lead
3 Counsel.

4 On November 6, 2007, the firms of Cotchett, Pitre & McCarthy (“Cotchett Firm”) and
5 Engstrom, Lipscomb & Lack, representing plaintiffs Donald Wortman, William Adams and
6 Margaret Garcia, filed a Class Action Complaint for Violations of the Sherman Antitrust Act,
7 15 U.S.C. § 1. The Cotchett and Lack Firms have successfully worked with one another on
8 numerous legal cases over the past several years. The Lack Firm has specialized in a broad
9 range of national and international high profile tort and commercial litigation matters, including
10 major antitrust litigation relating to manipulation of the California Natural Gas Markets. The
11 Lack Firm has a wide range of litigation experience in complex litigation, especially large
12 complex class action lawsuits. Most recently, the Lack Firm was actively involved in major
13 antitrust litigation relating to manipulation of the natural gas market in California:

- 14 • *Natural Gas Anti-Trust Cases I, II, III & IV (Pipeline Cases)*. The “Pipeline
15 Cases” were coordinated in San Diego County, J.C.C.P. Nos. 4221, 4224, 4226
16 and 4228. This case involved one of the largest antitrust class actions ever to be
17 brought. The class action which originated out of the California Energy Crisis -
18 was brought as a result of restraints put on California electrical and gas market.
19 So far, total settlements in excess of \$3.4 billion has been obtained on behalf of
20 the aggrieved California class members.
- 21 • *Natural Gas Anti-Trust Cases I, II, III & IV (Price Indexing Cases)*. The “Price
22 Indexing Cases” likewise were coordinated in San Diego County, J.C.C.P. Nos.
23 4221, 4224, 4226 and 4228. This case involved another large antitrust class action
24 arising out of the California Energy Crisis against the marketers of electricity. The
25 suit alleged that the Defendants manipulated natural gas prices at the California
26 border by a variety of means, including falsely reporting the prices and quantities
27 of natural gas transactions. Settlements have been reached with the majority of
28 the Defendants totaling approximately \$100 million dollars.

1 The Cotchett Firm is known to us to be a highly qualified law firm handling numerous
2 complex class action antitrust matters. The Lack Firm has extensive litigation experience in the
3 aviation field, which provides it with unique knowledge regarding that industry.

4 Having worked well with the Cotchett Firm in the past, the Lack Firm fully supports
5 Cotchett's Motion for Appointment as Interim Lead Counsel in the *Wortman, et al. v. Air New*
6 *Zealand, et al.* Class Action Antitrust Litigation.

7
8 Dated: March 6, 2008

ENGSTROM, LIPSCOMB & LACK

9
10 By: /S/ Richard P. Kinnan
11 WALTER J. LACK
12 ELIZABETH L. CROOKE
13 RICHARD P. KINNAN
14 Attorneys for Plaintiffs and the
15 Class
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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 10100 Santa Monica Boulevard, 16th floor, Los Angeles, CA 90067.

On March 7, 2008, I served the foregoing document **NOTICE OF SUPPORT FOR MOTION FOR APPOINTMENT OF INTERIM LEAD COUNSEL FILED BY PLAINTIFFS DONALD WORTMAN, WILLIAM ADAMS AND MARGARET GARCIA** on the interested party(ies) in this action by placing a true copy thereof enclosed in the sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

☐ BY MAIL: I deposited such envelope with the U.S. Postal Service at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postal meter date is more than 1 day after date of deposit for mailing in affidavit.

☐ BY PERSONAL DELIVERY: (1) I caused such envelope to be delivered by hand to the party represented by an attorney, delivery was made to the attorney or at the attorney's offices by leaving the documents in an envelope clearly labeled to identify the attorney being served with a receptionist or an individual in charge of the office; (2) For a party, delivery was made to the party by leaving the documents at the party's residence or place of business with a person not less than 18 years of age.

☐ VIA FACSIMILE: I caused all of the pages of the above entitled document to be sent to the recipients noted below via electronic transfer (FAX) at the respective facsimile number(s) indicated above. I received no transmission report indicating transmission was unsuccessful.

☐ BY OVERNIGHT DELIVERY: I served the above-entitled document(s) via overnight delivery carrier and addressed to the persons listed below. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

☒ BY E-MAIL/ELECTRONIC TRANSMISSION: through the USDC, North District of California's Em/ECF Courtlink to Electronic Filing to the interested parties registered thereon.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 7, 2008, at Los Angeles, California.

/S/
Merlene Fletcher

MAILING LIST

Wortman, et al. v. Air New Zealand, et al.
USDC, Northern District, CV 07-5634 EDL

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